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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SHANNEN BRADLEY, individually and as)
Personal Representative of the Estate of)
13 RICHARD WILLIAMS, deceased, SEAN) Case No. 2:12-cv-01526-APG-GWF
WILLIAMS and PATRICK WILLIAMS,)
14 Plaintiffs,)
15 v.)
16 UNITED STATES OF AMERICA,)
17 Defendant.)
18 _____

19 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
(First Request)

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21 The United States of America respectfully requests an extension of time to file an Opposition to
22 Plaintiff's Motion for Partial Summary Judgment (ECF 45), filed on March 18, 2014. An Opposition is
23 currently due on April 11, 2014.

24 In support of the instant Motion, the Federal Defendant submits the following:

25 1. This Motion is brought in order to accommodate the undersigned counsel for the United
26 States.

2. The requested extension of time is necessary in order for Government counsel to prepare an appropriate Opposition. Due to the issues surrounding this Motion, which are also at the center of the parties' settlement discussions, and the obvious implications if adequate and appropriate responses are not filed, additional time is required. Government counsel has been and continues to be heavily involved in several time-consuming cases which have demanded a great deal of time preparing for hearings, depositions, discovery and the like, making it difficult to meet the current deadline. Government counsel does not seek a significant extension of time, but rather only an additional nineteen (19) days, moving the deadline to April 30, 2014.

3. Government counsel has spoken with Plaintiffs' counsel who does not oppose this extension.

4. The instant motion is filed in good faith and not for the purposes of delay.

WHEREFORE, for the above reasons, the United States respectfully requests the instant Motion extending time until April 30, 2014, to file an Opposition to Plaintiff's Motion for Partial Summary Judgment, be granted.

Respectfully submitted this 10th day of April 2014.

DANIEL G. BOGDEN
United States Attorney

/s/ Justin E. Pingel
JUSTIN E. PINGEL
Assistant United States Attorney

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: April 11, 2014.